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To The Federal Communications Commission:

For twenty years, PCs for People has provided affordable technology to qualifying low-income individuals and families. As a national 501(c)(3) organization providing much-needed technology and support services to underserved Americans in all 50 states, we have become a nonprofit leader in the digital inclusion world.

PCs for People has partnered with a nonprofit Educational Broadband Service (EBS) licensee, Mobile Beacon, to create the "Bridging the Gap" program. Bridging the Gap works with local educational and nonprofit organizations (Bridging the Gap partners) to help to eligible income-qualified individuals and families below the 200% poverty level obtain an affordable refurbished computer and get online.¹

Today, a computer without internet access cannot provide low-income families with the same opportunities that their wealthier peers have. Our partnership with Mobile Beacon enables us to supplement our core service—providing affordable, refurbished computers—with the internet access needed to enable an eligible recipient to fully make use of technology in their home.

To date, Bridging the Gap has created a robust network of ongoing nonprofit support and resources through 188 Bridging the Gap partners. Today, more than 11,500 low-income households in 45 states have high-speed, reliable internet service that they could not otherwise afford. Recipient households have on average 3.2 individuals with 1.8 children per home, and they are surviving on an average of just \$14,000 per year. Without this service, children in these households would fall further behind the homework gap, and parents and other adults in the home would be unable to take online courses, apply for a job or develop other in-demand, marketable workforce skills, falling further behind in our highly digitized world.

I'm writing today to add PCs for People's voice in opposition to certain changes proposed by the FCC to the Educational Broadband Service rules. The educational use

¹ Eligibility requirements for the Bridging the Gap program are available at PCs for People, *Eligibility*, <https://pcsforpeople.com/recipients/eligibility>. PCs for People qualifies Bridging the Gap subscribers for the low-cost computer and internet service to ensure program eligibility standards are met, and validates ongoing eligibility every 12–15 months.



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requirements provided by the current EBS “leasing model” provide important benefits that directly benefit our target families and must be maintained to ensure they have ongoing access to essential broadband services.

Mobile Beacon’s current EBS lease emphasizes deploying the maximum number of broadband accounts/devices to support local educational and nonprofit entities like us that in turn make the service available to our qualifying individuals and families. This makes programs like Bridging the Gap possible. In revising the EBS rules, the FCC must be careful not to do so in a way that threatens the existence of programs like Bridging the Gap, which would cut off more than 36,000 low-income individuals from the technology they need to participate in today’s digital world.

A research study conducted on Bridging the Gap in 2017 reveals that:

- 73% of recipients had never had home internet access before Bridging the Gap;
- 60% of respondents whose previous internet service was subject to a data cap reported difficulty using the internet for online classes or homework;
- 22% said there were online educational activities they were unable to do because they did not have enough data.²

After receiving internet from Bridging the Gap:

- 94% of subscribers now use the internet daily (with 83% reporting to use it for several hours a day);
- 95% of parents said having Mobile Beacon’s internet service has helped them better support their child(ren) academically;
- 94% of all parents/guardians of school-age students report they communicate with their child’s teachers more often;
- 54% of parents reported their children spend more than four hours per week doing homework online.³

² Samantha Shartman-Cycyk & Katherine Messier, *Bridging the Gap: What Affordable, Uncapped Internet Means for Digital Inclusion* 4 (2017) (“*Bridging the Gap*”), https://www.mobilebeacon.org/wp-content/uploads/2018/05/MB_ResearchPaper_FINAL_WEB.pdf.



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National nonprofit EBS licensees like Mobile Beacon have been able to fill internet service gaps in areas government and private-sector low-cost programs do not reach. The basic services from commercial internet providers leave millions in the digital divide (particularly rural Americans) and low-income programs led by these companies have also fallen short. For example, a low-cost program run by one of the country's largest commercial internet service providers, has cumbersome eligibility requirements that freeze out low-income single adults and seniors. From our experience, the data allotment provided in this plan was also inadequate to meet the varied broadband needs of an entire household, and many otherwise eligible families were denied service because they had an overdue bill with the ISP in the last 12 months or because they had subscribed to that ISP's regular service in the last 90 days.

In contrast, because Bridging the Gap is a result of nonprofits coming together with a shared mission to provide technology to the underserved families who need it most, our program does not penalize internet subscribers who often cannot make their \$10-\$13 monthly payment on-time, or who are experiencing financial hardship and opt not to turn their internet back on for a few months. We understand that these families are often living in economic distress and one unplanned expense can compromise their ability to pay for basic necessities. If our recipients need to choose between \$10 to feed their families, keep their electricity on, or pay their internet provider, we want them to feed their families and keep their electricity on. We allow them to turn their internet back on as soon as they are able, with no penalty.

Existing federal programs also fail to provide complete relief. The E-Rate program does not provide funding for off-campus connectivity (essential for any students who do not live at their educational institution, especially most K-12 school age children in our underserved target population) and the Lifeline program has been rolled back by the FCC. Thus, low-income individuals and families already find themselves with a dwindling set of options to gain affordable internet access.

³ Samantha Shartman-Cycyk & Katherine Messier, *Bridging the Gap: What Affordable, Uncapped Internet Means for Digital Inclusion* 4 (2017) ("*Bridging the Gap*"), https://www.mobilebeacon.org/wp-content/uploads/2018/05/MB_ResearchPaper_FINAL_WEB.pdf.



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Commercializing EBS by allowing non-educational entities to hold the license and removing educational use requirements will ultimately lead to the elimination of educational use of the band. Commercial entities have the resources to offer very favorable transfer terms to gain unrestricted usage of the band, and the incentive to offer highly unfavorable (or no) lease terms to pressure licensees to sell. Most EBS licensees lack the means to fend off such attacks and would be forced to cease offering their services. Programs like Bridging the Gap—often the only affordable private broadband offer available to these low-income individuals and families—would be threatened, leaving only the commercial sector programs where there is no financial incentive to provide a high tier of data for a low-cost, and government-managed programs that also leave many millions of Americans unserved.

In lieu of the proposed changes, PCs for People encourages the FCC to expand the education use rule to recognize a broader range of educational programs that take place outside of formal accredited institutions. Workforce development, digital literacy training, and adult continuing education are all educational offerings whose enrollees would benefit from access to low-cost, high-capacity internet access. Allowing the private nonprofit sector to continue to expand their EBS programs to meet these needs puts our own resources to managing the needed services in underserved communities, minimizes the need for government intervention to provide these services, and keeps the commercial sector focused on expanding network capacity by shifting the responsibility for deploying services to these economically-depressed communities to organizations like ours.

The FCC also should not adopt a “local presence” definition based on having a physical mailing address. A better definition would be one that recognizes demonstrated local service within a community. Although Bridging the Gap is a national program, its model emphasizes partnerships with local nonprofit and educational organizations that understand their underserved constituents best. This ensures that the people who are the greatest need of digital inclusion are reached first. Thus, for example, despite not having a physical address in Salt Lake City, UT⁴ or Austin, TX,⁵ Bridging the Gap partnered with 12 local anchor institutions

⁴ PCs for People & Mobile Beacon, *Digital inclusion program, Bridging the Gap, distributed 300 computers and internet service to low-income residents in Salt Lake City* (2017)

https://www.bizjournals.com/boston/prnewswire/press_releases/Georgia/2017/10/31/DC30654?ana=prnews



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to provide 488 donated computers and 237 donated hotspots to qualified recipients. With the help of local anchor institutions, now hundreds of low-income households in both cities have improved access to education, employment opportunities, healthcare, and other benefits that come from equitable access to technology. The FCC should encourage further development of nonprofit partnership-driven model like Bridging the Gap's.

The FCC should not narrow the definition of eligible EBS licensees to exclude nonprofits. Rather, the FCC should encourage collaboration among community organizations to facilitate broadband deployment among the maximum number of anchor institutions to meet the needs of their communities.

Sincerely,

Casey Sorensen

CEO,

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⁵ Jason Puckett & KVUE, *300 free computers and 150 hotspots helping Austinites get online* (2017) (<https://www.kvue.com/article/news/local/300-free-computers-and-150-hotspots-helping-austinites-get-online/269-525087151>)